

1  
2  
3  
4  
5  
6  
7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10

11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

14 This Document Relates to:

15 ALL LOCAL GOVERNMENT AND  
16 SCHOOL DISTRICT ACTIONS  
17  
18

**STIPULATION REGARDING  
AMENDED IMPLEMENTATION  
ORDER GOVERNING ADOPTION OF  
MASTER COMPLAINT (LOCAL  
GOVERNMENT AND SCHOOL  
DISTRICT) AND SHORT-FORM  
COMPLAINTS FOR FILED CASES**

19 The parties, by their undersigned counsel, hereby **STIPULATE** as follows:  
20

21 **WHEREAS**, on February 20, 2024, the Court entered a *Stipulated Implementation Order*  
22 *Governing Adoption of Master Complaint (Local Government and School District) and Short-Form*  
23 *Complaints for Filed Cases (“Implementation Order”)* (Dkt. No. 620) which applied only to Local  
24 Government Entities and School Districts, including school districts, municipalities, county district  
25 attorneys, and counties, who have asserted or seek to assert claims related to Defendants’ social  
26 media platforms (“Local Government and School District Plaintiffs”) in this MDL.

27 **WHEREAS**, attached as Exhibit A to the *Implementation Order* was a template form *Short-*  
28 *Form Complaint* (“SFC”) for use by Local Government and School District Plaintiffs in current

1 and future-filed cases in this MDL.

2 **WHEREAS**, the template form SFC attached to the *Implementation Order* inadvertently  
 3 omitted two Meta Entities named Master Complaint (School District) (“*Master Complaint*”) (Dkt.  
 4 No. 504) (Facebook Holdings, LLC and Meta Payments, Inc.).<sup>1</sup>

5 **WHEREAS**, Exhibit 1 to the attached proposed *Amended Stipulated Order Governing*  
 6 *Adoption of Master Complaint (Local Government and School District) and Short-Form*  
 7 *Complaints for Filed Cases* (“*Amended Implementation Order*”) is an updated and corrected  
 8 template form SFC for use by Local Government and School District Plaintiffs, which should  
 9 replace the form template SFC attached to the original *Implementation Order* (Dkt. No. 620-1) and  
 10 should be the operative SFC for Local Government and School District Plaintiffs in this MDL.

11 **WHEREAS**, the parties respectfully request the Court enter the attached proposed  
 12 *Amended Implementation Order*.

13 **IT IS HEREBY STIPULATED BY:**

14 /s/ Lexi J. Hazam  
 15 LEXI J. HAZAM  
 16 LIEFF CABRASER HEIMANN &  
 17 BERNSTEIN, LLP  
 275 BATTERY STREET, 29<sup>TH</sup> FLOOR  
 18 SAN FRANCISCO, CA 94111-3339  
 Telephone: 415-956-1000  
 lhazam@lchb.com

19 PREVIN WARREN  
 20 MOTLEY RICE LLC  
 401 9th Street NW Suite 630  
 Washington DC 20004  
 T: 202-386-9610  
 pwarren@motleyrice.com

21 *Co-Lead Counsel*

22  
 23  
 24  
 25  
 26  
 27  
 28  


---

<sup>1</sup> See Dkt. No. 504 at paras. 42 and 44.

CHRISTOPHER A. SEEGER  
**SEEGER WEISS, LLP**  
55 CHALLENGER ROAD, 6<sup>TH</sup> FLOOR  
RIDGEFIELD PARK, NJ 07660  
Telephone: 973-639-9100  
Facsimile: 973-679-8656  
[cseeger@seegerweiss.com](mailto:cseeger@seegerweiss.com)

*Counsel to the Lead Counsel*

JENNIE LEE ANDERSON  
**ANDRUS ANDERSON, LLP**  
155 MONTGOMERY STREET, SUITE 900  
SAN FRANCISCO, CA 94104  
Telephone: 415-986-1400  
[jennie@andrusanderson.com](mailto:jennie@andrusanderson.com)

*Liaison Counsel*

MICHAEL M. WEINKOWITZ  
**LEVIN SEDRAN & BERMAN, LLP**  
510 WALNUT STREET  
SUITE 500  
PHILADELPHIA, PA 19106  
Telephone: 215-592-1500  
[mweinkowitz@lfsbalw.com](mailto:mweinkowitz@lfsbalw.com)

*Plaintiff Leadership Committee*  
*Co-Chair of Local Government Entity Committee*

MELISSA L. YEATES  
**KESSLER TOPAZ**  
**MELTZER CHECK, LLP**  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: 610-667-7706  
[myeates@ktmc.com](mailto:myeates@ktmc.com)

*Co-Chair of Local Government Entity Committee*

**COVINGTON & BURLING LLP**

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen, SBN 275203  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: (424) 332-4800  
Facsimile: + 1 (424) 332-4749  
Email: [asimonsen@cov.com](mailto:asimonsen@cov.com)

Phyllis A. Jones, *pro hac vice*  
Paul W. Schmidt, *pro hac vice*  
COVINGTON & BURLING LLP

One City Center  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc.  
f/k/a Facebook, Inc.; Facebook Holdings, LLC;  
Facebook Operations, LLC; Facebook  
Payments, Inc.; Facebook Technologies, LLC;  
Instagram, LLC; Siculus, Inc.; and Mark Elliot  
Zuckerberg*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

ALL LOCAL GOVERNMENT AND  
SCHOOL DISTRICT ACTIONS

**[PROPOSED] AMENDED STIPULATED  
IMPLEMENTATION ORDER  
GOVERNING ADOPTION OF MASTER  
COMPLAINT (LOCAL GOVERNMENT  
AND SCHOOL DISTRICT) AND  
SHORT-FORM COMPLAINTS FOR  
FILED CASES**

1. On February 20, 2024, the Court entered a *Stipulated Implementation Order Governing Adoption of Master Complaint (Local Government and School District) and Short-Form Complaints for Filed Cases* (“*Implementation Order*”) (Dkt. No. 620) which applied only to Local Government Entities and School Districts, including school districts, municipalities, county district attorneys, and counties, who have asserted or seek to assert claims related to Defendants’ social media platforms (“Local Government and School District Plaintiffs”) in this MDL.

2. Attached as Exhibit A to the *Implementation Order* was a template form *Short-Form Complaint* (“SFC”) for use by Local Government and School District Plaintiffs in current and future-filed cases in this MDL.

3. The Parties have advised that the template form SFC attached to the *Implementation Order* inadvertently omitted two Meta Entities named Master Complaint (School District) (“*Master Complaint*”) (Dkt. No. 504) (Facebook Holdings, LLC and Meta Payments, Inc.).<sup>2</sup>

4. The template form SFC attached as Exhibit A to the *Implementation Order* is stricken and shall not be used. Attached hereto as **Exhibit 1** is an updated template form SFC for use by Local Government and School District Plaintiffs containing the necessary corrections, which

<sup>2</sup> See Dkt. No. 504 at paras. 42 and 44.

1 shall replace the form template SFC attached to the original *Implementation Order* (Dkt. No. 620-  
2 1) and shall be the operative SFC for Local Government and School District Plaintiffs in this MDL.

3 5. **Amended Timing of Filing Short Form Complaints**

4 a. **Complaints Transferred, or in the Process of Being Transferred, to this**  
5 **MDL Before the Filing of this Order:** Any Local Government and School District Plaintiff whose  
6 Complaint was transferred to this MDL or was in process of being transferred to this MDL before  
7 the date of filing this Order must file a SFC in their individual case, referencing their individual  
8 docket number to avoid the triggering of a filing fee, by March 5, 2024, or 10 days after entry of  
9 this Order, whichever is later.

10 6. All other provisions of the *Implementation Order* (Dkt. No. 620) remain in full force  
11 and effect.

12 **IT IS SO ORDERED,**

13 Dated: \_\_\_\_\_, 2024

14  
15 YVONNE GONZALEZ ROGERS  
16 UNITED STATES DISTRICT JUDGE  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28